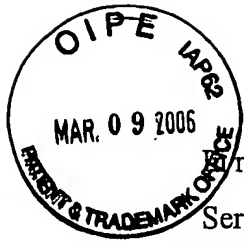


PATENT

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE



Entire Application of: Falk et al.  
Serial Number: 10/761,578  
Filing Date: January 21, 2004  
Group Art Unit: 2173

For: **METHOD AND SYSTEM FOR AUTOMATING CREATION  
OF MULTIPLE STYLESHEET FORMATS USING AN  
INTEGRATED VISUAL DESIGN ENVIRONMENT**

Commissioner for Patents  
P.O. Box 1450  
Alexandria, VA 22313-1450

**DECLARATION OF ALEXANDER FALK**

I, the undersigned, Alexander Falk, declare and state that:

1. I submit this Declaration in support of an Amendment & Response Under 37 C.F.R. §1.111 in reply to the non-final Office Action mailed December 16, 2005, to overcome the applied reference, namely the Lloyd et al, Published Patent Application No. 2005/0132284 A1 ("Lloyd et al."), and to clarify the status of the other cited reference, the Altova "Stylevision 5 User and Reference Manual" (the "Reference Manual").

2. I, together with Vladislav Gavrielov, am an inventor of the subject matter disclosed and claimed in the above-identified patent application, U.S. Patent Application No. 10/761,578. I am also the Chief Executive Officer of Altova, Inc., which is wholly-owned by Altova, GmbH, the owner of the subject application. I am also President and Chief Executive Officer of Altova, GmbH.

3. I have read and understand U.S. Patent Application No. 10/761,578, including the claims in which:

Claim 1 recites:

In a data processing system having a windows-based graphical user interface (GUI), the improvement comprising:

an integrated visual design environment having a first display panel in which a structured data source is displayed, and a second display panel for displaying a document being designed from the structured data source;

code responsive to selection and positioning in the second display panel of given design elements or attributes from the structured data source for generating a meta stylesheet; and

code for automatically generating from the meta stylesheet two or more stylesheets from within the integrated visual design environment, wherein each of the stylesheets is useful for generating the document being designed in a given output format.

**Claim 15 recites:**

A data processing system having a windows-based graphical user interface (GUI), comprising:

a display environment having a first display panel in which a structured data source is displayed, and a second display panel for displaying a document being designed from the structured data source, wherein the data source is selected from a set of data sources including: an XML document, an XML schema, a DTD, an EDI document, a relational database, and a Web service;

code responsive to selection and positioning in the second display panel of given design elements or attributes from the structured data source for generating given program code; and

code for automatically generating from the given program code two or more program code instances from within the integrated visual design environment, wherein each of the program code instances is useful for generating the document being designed in a given output format.

**Claim 20 recites:**

A display method operative in a data processing system having a windows-based graphical user interface (GUI), comprising:

displaying, in juxtaposition, a structured data source and a document being designed from the structured data source, wherein the data source is selected from a set of data sources including: an XML document, an XML schema, a DTD, an EDI document, a relational database, and a Web service;

responsive to selection and positioning in the document being designed of given design elements or attributes from the structured data source, generating given program code;

automatically generating from the given program code two or more program code instances, wherein each of the program code instances is useful for generating the document being designed in a given output format; and

selectively displaying a preview of an output document rendered as a result of applying a given one of the program code instances.

4. I have also reviewed the December 16, 2005 non-final Office Action that:

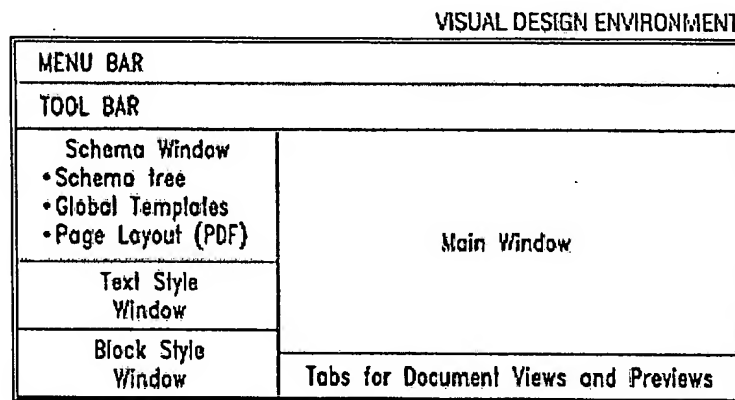
(a) contends that claims 1-20 are anticipated under 35 U.S.C. §102(e) by the “Lloyd et al” application; and

(b) contends that claims 1, 15 and 20 are anticipated under 35 U.S.C. §102(a) by the Altova Stylevision 5 User and Reference Manual (the “Reference Manual”).

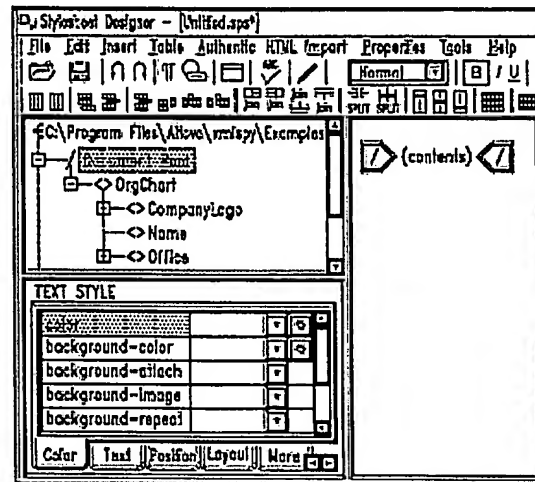
5. By way of brief background, the present invention is designed to be implemented as an improvement to a data processing system having a windows-based graphical user interface (GUI). As is well-known, a “stylesheet” is typically an ASCII

text document; it is associated with a markup language-encoded document (e.g., an HTML or XML document) and typically contains instructions specifying how to format and display the encoded document, or how to transform the encoded document into another format.

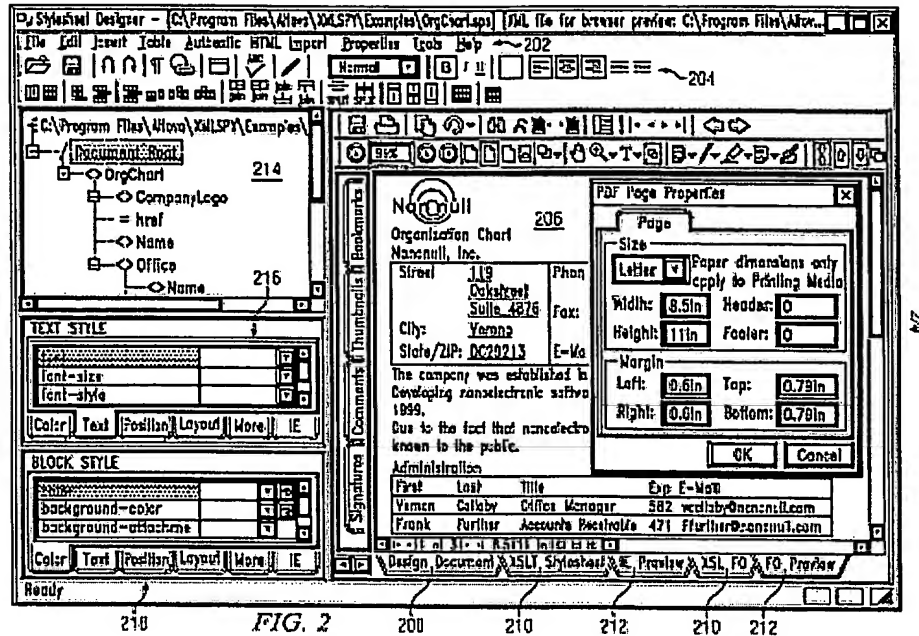
6. In an illustrative embodiment of my invention, a computer-implemented method of automatic writing of complex stylesheets uses an intuitive drag-and-drop user interface. By opening an existing structured data source (e.g., an XML document, an XML Schema, DTD, relational database, EDI document, a Web service, or the like), a content model appears in a given display panel of the interface ("Schema Window"), preferably in a tree-like controller.



7. The user of the tool (typically, an information designer) then selects an element or attribute that he or she desires to appear in an output and drags the element or attribute from the given display panel to a main output window. This is illustrated below:



8. The designer then specifies how he or she would like the new node to be handled (e.g., as a new paragraph, image, table, or the like). According to a feature of the invention, a stylesheet, sometimes referred to as a “meta stylesheet,” is automatically generated (or is generated as the designer positions elements and attributes in the main output window). Typically, the meta stylesheet is maintained as an internal data representation, although it may be displayable if desired. According to an aspect of the invention, two or more stylesheets are generated from the meta stylesheet and from within the integrated visual design environment, with each of the stylesheets being useful for generating the document being designed in a given output format. Thus, in a representative example, the two or more stylesheets include a first XSLT stylesheet for transforming an XML document into HTML, and a second XSLT stylesheet to facilitate transformation of the XML document into PDF via XSL:FO. Each of the stylesheets may be automatically previewed in the GUI by simply selecting a preview tab, as indicated below:



9. Another control tab (212) may be used to preview the output document rendered through the respective stylesheet.

10. Thus, according to the invention, a unified visual design environment is provided in a data processing system to enable automatic generation of a plurality of stylesheets for different output formats. The invention enables support for visual editing and generation of extensible Stylesheet Language (XSL) code, such as XSL code that enables XML content to be rendered into an HTML file, XSL:FO code that enables XML content to be rendered into a PDF file, and the like. With a single stylesheet design, developers can preview an output of a stylesheet transformation in one of several different formats, e.g., HTML, PDF, or others.

11. As noted above, I have carefully reviewed the first action in this application, which I understand was issued by the United States Patent & Trademark Office Examiner on December 16, 2005. In this regard, I have also analyzed Lloyd et al., Published Patent Application 2005/0132284 A1, which application was published on June 16, 2005, and which derives from Serial No. 10/839,320, filed on May 5, 2004. Serial No. 10/839,320 claims on its face to be based upon provisional application Serial No. 60/468,126, filed on May 5, 2003. I have further reviewed and accept the Examiner's conclusion that the Lloyd et al. provisional application "describes" the invention set forth

in Published Patent Application 2005/0132284. In other words, I believe it is reasonable to conclude that the Lloyd et al. application cited against my patent claims is entitled to an effective filing date of May 5, 2003.

12. Nevertheless, the subject matter disclosed and claimed in the subject patent application Serial No. 10/761,578 was reduced to practice prior to May 5, 2003.

13. In particular, the subject invention was first available to the public in Version 5 Release 3 of Altova's xmlSpy product, which was released to the public commercially on January 22, 2003. Attached as Exhibit A is the press release, dated January 22, 2003, announcing the product launch. The product itself was available as a software download from the Altova web site, [www.altova.com](http://www.altova.com), from servers located in the United States, on that day. With reference to Exhibit A, page 2, there is a specific reference to an "[i]mproved drag/drop functionality in Stylesheet Designer." This was a direct reference to the subject matter that is now positively recited in the claims of the above-identified patent application. This subject matter, however, was not publicly known or used by others in the United States or elsewhere before this date. In addition, the subject matter of this patent application was not patented or described in a printed publication in the United States or a foreign country, or in public use or on sale in the United States, at any time before January 22, 2003. Altova later changed the name of the product from "Stylesheet Designer" to "StyleVision."

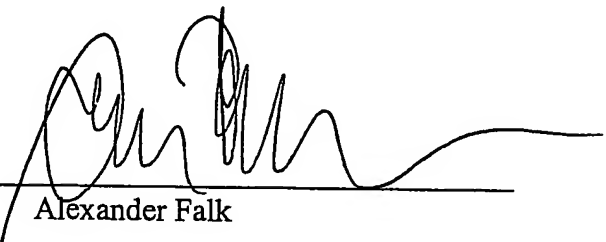
14. In addition, on January 22, 2003, the same day that Altova made the actual Stylesheet Designer product available (as a software download), the Company also posted for download the Reference Manual itself. This was the first time the Reference Manual was accessible to the public. The Reference Manual was posted at the following URL on that date: <http://www.altova.com/download/5/stylevision5.pdf>

15. Thus, as of May 5, 2003, the subject invention had already been reduced to practice and was available as a software download from the Altova web site, from servers located in the United States. By that date, more than 201,235 copies of the Stylesheet Designer product had been downloaded from our Company web site. In addition, as of May 5, 2003, the Reference Manual had been downloaded from the Altova web site at

least 16,807 times. The Reference Manual, which was posted on January 22, 2003, is further evidence of the reduction to practice of the subject invention prior to May 5, 2003.

16. The Reference Manual that was cited by the Examiner is a work published by Altova under the direction of my co-inventor and myself. As noted above, the Reference Manual was not accessible to the public prior to January 22, 2003, and this Reference Manual was created after the software itself had been written. Further, with respect to at least those portions of the Reference Manual specifically relied upon by the Examiner (pages 271, 273, 275, 279-280, 328 and 369), my co-inventor and I were either the co-authors of this material or Altova employees under our direction derived their knowledge of this subject matter from us.

I further declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code, and that such willful false statements may jeopardize the validity of the above-referenced application or any patent issuing thereon

By:   
Alexander Falk

## **Altova Simplifies XML Development Through Enhanced Support for Microsoft .NET, Oracle XML DB, Web Services and Document Publishing in XMLSPY 5 Release 3**

**New features further demonstrate XMLSPY 5 is the most comprehensive XML development environment for any XML-enabled software project.**

Beverly, MA, January 22, 2003. – Altova Inc., producer of XMLSPY, the world's leading XML development tool with over a million registered users, today announced the availability of XMLSPY 5 Release 3. Presently, XML technologies today are being applied to solve a wide spectrum of enterprise computing challenges, including electronic commerce, document publishing, database integration, and web services applications. To maximize software developer productivity in implementing any XML-enabled solution, Altova has added enhanced developer support for various widely used enterprise technologies, thereby accelerating and simplifying XML development. The new version of XMLSPY is available immediately for free trial download.

To meet the needs of enterprise developers, XMLSPY 5 builds on the success of previous award winning versions through the addition of several key new features:

- \* Improved Support for building Microsoft .NET applications – The XMLSPY 5 Code Generator now supports Microsoft C# code generation to accelerate application development on the Microsoft .NET platform. Use XMLSPY to Model data elements in XML Schema, then XMLSPY can auto-generate C# class (data bindings) corresponding to elements defined in the data model. The generated code uses System.XML, the new Microsoft .NET Application Program Interface (API) for programmatically accessing XML documents.

- \* Enhanced support for Oracle XML DB – XMLSPY 5 now includes numerous new data editing and server administration features for Oracle XML DB, the World's Most Scalable XML Database. XMLSPY's new features enable developers to easily perform common operations on data managed by XML DB including: List XML Schemas, Load a Schema from a list, Save New or Delete XML Schema to Oracle XML DB, Register an XML Schema



with Oracle XML DB, Execute Query using Oracle9i's DBURI, Browse, Open, Edit and Save XML documents stored in Oracle XML DB via WebDAV. The new features make XMLSPY 5 powerful must-have utility for Oracle DBA's and database developers.

- \* Additional Web Services Support – A new Web Service Description Language (WSDL) Documentation generation utility makes it easier for a Web service developer to document and publish a Web service's interface to business partners, other developers, or to the public. Any WSDL file can be easily annotated, then published into a Microsoft Word or HTML output file.

- \* PDF support for Document Publishing – XMLSPY's stylesheet designer now supports visual editing and generation of eXtensible Stylesheet Language Formatting Object (XSL:FO) code, which enables XML content to be rendered into a PDF file. Now, with a single stylesheet design, developers can preview the output of a stylesheet transformation in either PDF or HTML.

- \* Usability Enhancements for Stylesheet Designer: Improved drag/drop functionality in Stylesheet Designer.

- \* New Java Integration Support - A new Java API enables easier customization and integration of the XMLSPY development environment for system integrators or Java-based product companies wanting to extend the functionality of XMLSPY. Now, programmers can control and use XMLSPY functionality from their Java-based programs. XMLSPY already supports integration via a COM based interface.

## **Pricing and Availability**

XMLSPY 5 Release 3 is available immediately for free trial download and purchase from the Altova Online Shop, [www.altova.com/order](http://www.altova.com/order). Existing XMLSPY 5 customers who have purchased a support and maintenance plan are eligible for a free upgrade. See website for complete price-list including special upgrade pricing for current customers, as well as multi-user or concurrent-user licenses or corporate support & maintenance contracts; or contact [sales@altova.com](mailto:sales@altova.com).

Visit the Altova booth and see a live demonstration of the new Altova product line at an upcoming software tradeshow this spring 2003:

- Wall Street on Java, New York, New York, February 4-5

- Web Services Edge East, Boston, Massachusetts, March 19-20

## About Altova

Altova, Inc. is a leading provider of XML software solutions with offices in Beverly, MA and Vienna, Austria. The privately held company was founded in 1992 and has been actively involved in the XML market from the early conception of Extensible Markup Language. Altova's XMLSPY 5 is the leading choice of Fortune 500 and Global 1000 companies. Altova's XMLSPY 5 product line is the world's best-selling XML tool and has won the leading industry awards including PC Magazine's Editor's Choice Award and Best Product of 2002. Altova is a technology partner with the world's leading software companies including Microsoft, Oracle, IONA, and Software AG. Altova is a member of the W3C and WS-I. Visit Altova on the web at <http://www.altova.com>.

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Altova, XMLSPY, STYLEVISION, AUTHENTIC and AXAD are trademarks of Altova GmbH registered in numerous countries. The names of and reference to companies and products mentioned herein may be the trademarks of their respective owners.

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EU: 43 (1) 545 5155 - 0

**PATENT**

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

In re Application of: Falk et al.  
Serial Number: 10/761,578  
Filing Date: January 21, 2004  
Group Art Unit: 2173

For: **METHOD AND SYSTEM FOR AUTOMATING CREATION  
OF MULTIPLE STYLESHEET FORMATS USING AN  
INTEGRATED VISUAL DESIGN ENVIRONMENT**

Commissioner for Patents  
P.O. Box 1450  
Alexandria, VA 22313-1450

**DECLARATION OF VLADISLAV GAVRIELOV**

I, the undersigned, Vladislav Gavriellov, declare and state that:

1. I submit this Declaration in support of an Amendment & Response Under 37 C.F.R. §1.111 in reply to the non-final Office Action mailed December 16, 2005, to overcome the applied reference, namely the Lloyd et al, Published Patent Application No. 2005/0132284 A1 ("Lloyd et al."), and to clarify the status of the other cited reference, the Altova "Stylevision 5 User and Reference Manual" (the "Reference Manual").

2. I, together with Alexander Falk, am an inventor of the subject matter disclosed and claimed in the above-identified patent application, U.S. Patent Application No. 10/761,578. I am also the President and CTO of Altova, GmbH, the owner of the subject application.

3. I have read and understand U.S. Patent Application No. 10/761,578, including the claims in which:

Claim 1 recites:

In a data processing system having a windows-based graphical user interface (GUI), the improvement comprising:

an integrated visual design environment having a first display panel in which a structured data source is displayed, and a second display panel for displaying a document being designed from the structured data source;

code responsive to selection and positioning in the second display panel of given design elements or attributes from the structured data source for generating a meta stylesheet; and

code for automatically generating from the meta stylesheet two or more stylesheets from within the integrated visual design environment, wherein each of the stylesheets is useful for generating the document being designed in a given output format.

**Claim 15 recites:**

A data processing system having a windows-based graphical user interface (GUI), comprising:

a display environment having a first display panel in which a structured data source is displayed, and a second display panel for displaying a document being designed from the structured data source, wherein the data source is selected from a set of data sources including: an XML document, an XML schema, a DTD, an EDI document, a relational database, and a Web service;

code responsive to selection and positioning in the second display panel of given design elements or attributes from the structured data source for generating given program code; and

code for automatically generating from the given program code two or more program code instances from within the integrated visual design environment, wherein each of the program code instances is useful for generating the document being designed in a given output format.

**Claim 20 recites:**

A display method operative in a data processing system having a windows-based graphical user interface (GUI), comprising:

displaying, in juxtaposition, a structured data source and a document being designed from the structured data source, wherein the data source is selected from a set of data sources including: an XML document, an XML schema, a DTD, an EDI document, a relational database, and a Web service;

responsive to selection and positioning in the document being designed of given design elements or attributes from the structured data source, generating given program code;

automatically generating from the given program code two or more program code instances, wherein each of the program code instances is useful for generating the document being designed in a given output format; and

selectively displaying a preview of an output document rendered as a result of applying a given one of the program code instances.

4. I have also reviewed the December 16, 2005 non-final Office Action that:
  - (a) contends that claims 1-20 are anticipated under 35 U.S.C. §102(e) by the "Lloyd et al" application; and
  - (b) contends that claims 1, 15 and 20 are anticipated under 35 U.S.C. §102(a) by the Altova Stylevision 5 User and Reference Manual (the "Reference Manual").

5. As noted above, I have reviewed the Lloyd et al., Published Patent Application 2005/0132284 A1, which application was published on June 16, 2005, and which derives from Serial No. 10/839,320, filed on May 5, 2004. Serial No. 10/839,320

claims on its face to be based upon provisional application Serial No. 60/468,126, filed on May 5, 2003.

6. The subject matter disclosed and claimed in the subject patent application Serial No. 10/761,578 was reduced to practice prior to May 5, 2003.

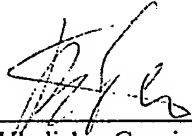
7. In particular, the subject invention was first available to the public in Version 5 Release 3 of Altova's xmlSpy product, which was released to the public commercially on January 22, 2003. The product itself was available as a software download from the Altova web site, [www.altova.com](http://www.altova.com), from servers located in the United States, on that day. This subject matter, however, was not publicly known or used by others in the United States or elsewhere before this date. In addition, the subject matter of this patent application was not patented or described in a printed publication in the United States or a foreign country, or in public use or on sale in the United States, at any time before January 22, 2003.

8. In addition, on January 22, 2003, the same day that Altova made the actual Stylesheet Designer product available (as a software download), the Company also posted for download the Reference Manual itself. This was the first time the Reference Manual was accessible to the public. The Reference Manual was believed to have posted at the following URL on that date: <http://www.altova.com/download/5/stylevision5.pdf>

9. Thus, as of May 5, 2003, the subject invention had already been reduced to practice and was available as a software download from the Altova web site. The Reference Manual, which was posted on January 22, 2003, is further evidence of the reduction to practice of the subject invention prior to May 5, 2003.

10. The Reference Manual that was cited by the Examiner is a work published by Altova under the direction of my co-inventor and myself. As noted above, the Reference Manual was not accessible to the public prior to January 22, 2003, and this Reference Manual was created after the software itself had been written. Further, with respect to at least those portions of the Reference Manual specifically relied upon by the Examiner (pages 271, 273, 275, 279-280, 328 and 369), my co-inventor and I were either the co-authors of this material or Altova employees under our direction derived their knowledge of this subject matter from us.

I further declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code, and that such willful false statements may jeopardize the validity of the above-referenced application or any patent issuing thereon

By:  \_\_\_\_\_  
Vladislav Gavrielov